

L I C H T E N & L I S S - R I O R D A N , P. C.

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April 7, 2023

**VIA CM/ECF AND EMAIL**

Hon. Nelson S. Román  
United States District Judge  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

USDC SDNY  
DOCUMENT  
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DATE FILED: 4/7/2023

RE: Tyskowski v. International Business Machines Corp.,  
Civ. Act. No. 7:22-cv-08207-NSR

Dear Judge Román:

Pursuant to the Court's Order of April 6, 2023 (Dkt. 28), Plaintiff submits this letter motion to request that the Plaintiff's Petition and Motion to Vacate Arbitration Award (with accompanying exhibits) be provisionally sealed.

At the Court's direction, Plaintiff has now filed under seal an unredacted version of the Motion to Vacate Arbitration and its supporting exhibits at Dkts. 29, and 29-1 through 29-15. Plaintiff requests that these documents be provisionally sealed until the Court has had the opportunity to consider the parties' briefing on IBM's anticipated motion to permanently seal the documents, which will be submitted pursuant to the schedule in the Court's Order of April 6, 2023 (Dkt. 28).

Additionally, because the Court's CM/ECF system does not allow for Plaintiff's Petition to be filed under seal, at the suggestion of Your Honor's Chambers, the Petition will be submitted to Chambers by email with a courtesy copy of this letter motion. Plaintiff likewise requests that the Petition provisionally sealed until the parties.

MEMO ENDORSED

L I C H T E N   &   L I S S - R I O R D A N ,   P. C.

Sincerely,

/s/ Shannon Liss-Riordan  
Shannon Liss-Riordan

cc:     All counsel of record for Defendant via CM/ECF and email

**CERTIFICATE OF SERVICE**

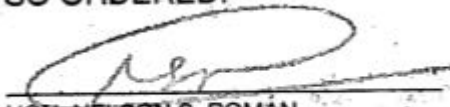
I, Shannon Liss-Riordan, certify that on April 7, 2023, the foregoing document was served on all counsel of record for Defendant via filing on the Court's CM/ECF system.

Date: April 7, 2023

/s/ Shannon Liss-Riordan  
Shannon Liss-Riordan

The Court GRANTS Plaintiff's request to provisionally seal Plaintiff's Petition and Motion to Vacate Arbitration (with supporting exhibits). Additionally, the Court confirms that Chambers will file Plaintiff's Petition under seal. The Clerk of the Court is kindly directed to terminate the motion at ECF No. 30.

Dated: April 7, 2023  
White Plains, NY

SO ORDERED:  
  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE